

U.S. DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
FILED

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE - OPELOUSAS DIVISION

NOV 24 1999

ROBERT H. SHENNELL, CLERK  
BY *[Signature]* DEPUTY

JOEL A. MORVANT, SR., MONICA \* CIVIL ACTION NO. CV 99-1427 L-O

MORVANT, JOEL A. MORVANT, JR. \*

AND RIDGE M. MORVANT \*

\*

VERSUS \* JUDGE SHAW

\*

L&L SANDBLASTING, INC. and \*

CXY ENERGY, INC. \*

\*

MAGISTRATE METHVIN

\* \* \* \* \*

PRELIMINARY EXHIBIT LIST

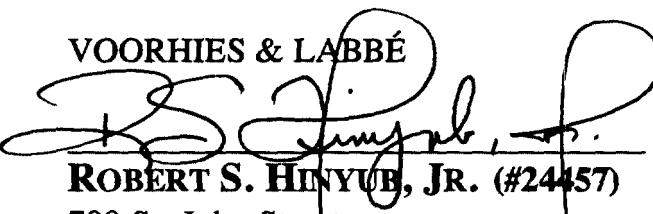
L&L Sandblasting, Inc., who in compliance with the Court's November 8, 1999 Scheduling Conference Order, respectfully submits that it may introduce the following exhibits at trial:

1. CXY Energy's Scope of Work Contract - will be offered to establish the nature of agreement and responsibilities of L&L Sandblasting, Inc. for job in issue;
2. Employers First Report of Injury, dated August 27, 1998 - will be offered to establish description of reported incident, witnesses and investigation as to the cause of the alleged incident;
3. L&L Sandblasting, Inc.'s Daily Time Records will be ordered to establish work being performed by plaintiff
4. Federal and State Income Tax Returns of plaintiff for 1995 through 1998 with attached W2 forms as received from the IRS - will be offered to establish actual income earned by plaintiff and earnings history;
5. Personal Earnings and Benefit Estimate Statement from Social Security Administration - will be offered to establish actual income earned by plaintiff and earnings history;
6. L&L Sandblasting, Inc.'s payroll records concerning plaintiff will be offered to establish income earned by plaintiff while employed by the Nacher Corporation;

7. Any and all hospital and/or physician records, reports, lab tests, x-rays, diagnostic test, etc., in connection with the treatment and prognosis of Brooks;
8. Employment Records of plaintiff from the L&L Sandblasting, Inc. - will be offered to establish earnings and employment history of plaintiff, other personal information provided by plaintiff, duties and responsibilities of plaintiff, and experience and training of plaintiff;
9. L&L Sandblasting, Inc.'s Safety Manual - will be offered to establish duties and responsibilities of plaintiff;
10. All relevant insurance policies;
11. All pleadings filed in this matter;
12. Any statements, depositions, and/or other documentation for impeachment or rebuttal purposes;
13. Any photographs of the scene of the alleged accident;
14. Any exhibit listed by any other party in this litigation; and
14. L&L Sandblasting, Inc. expressly reserves the right to supplement and amend this list as and when more information becomes available.

Respectfully submitted,

VOORHIES & LABBÉ

  
ROBERT S. HINYUE, JR. (#24457)

700 St. John Street

Post Office Box 3527

Lafayette, LA 70502-3527

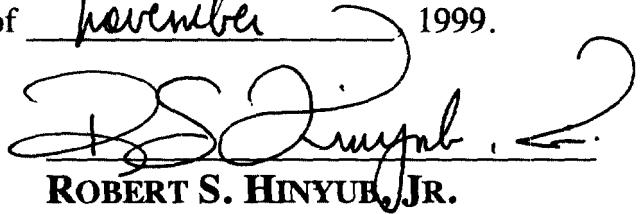
Phone: (318) 232-9700

Counsel for L&L SANDBLASTING,  
INC.

**C E R T I F I C A T E**

I HEREBY CERTIFY that a copy of the above and foregoing has this day been forwarded to all known counsel of record by depositing same in the United States mail, postage prepaid and properly addressed.

Lafayette, Louisiana this 23rd day of November 1999.

  
ROBERT S. HINYER, JR.

H. Edwin McGlasson  
W. Gerald Gaudet†  
Richard D. Chappuis, Jr.

RECEIVED  
William M. Bass  
John Nickerson Chappuis

Robert L. Ellender  
NOV 24 1999  
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Robert M. Francez  
Robert M. K. SHERIFF CLERK  
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Sam R. Aucoin  
James A. Lochridge, Jr.

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†Admitted to Practice in Georgia

†Admitted to Practice in Texas

Writer's Email: [rsh@vola.com](mailto:rsh@vola.com)

November 23, 1999

Honorable Catherine B. Carter  
Deputy Clerk in Charge  
USDC, Western District of Louisiana  
800 Lafayette Street, Suite 2100  
Lafayette, LA 70501

**RE:** Joel A. Morvant, et al v. L&L Sandblasting  
and CXY Energy, Inc.  
Civil Action No. CV 99-1427-LO  
Our File No.: 00551-0585

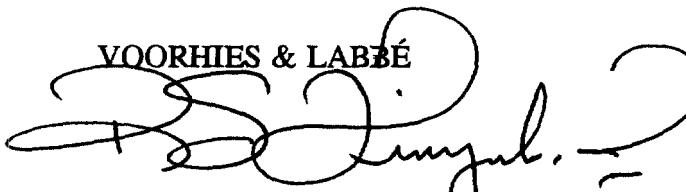
Dear Ms. Carter:

Enclosed please find the originals and one copy of L&L Sandblasting, Inc.'s May Call  
Witness List and Preliminary Exhibit List. Please file the originals into the record and return the  
copies, stamped with the date and time of filing to my office for my files.

- No envelope

Thanking you in advance for your cooperation in this matter and, with kindest personal  
regards, I remain

Sincerely,

  
**VOORHIES & LABBÉ**  
**ROBERT S. HINYUB, JR.**

RSH/kab/138896

cc: Mr. Kenneth Jacques  
Mr. Bruce Hoefer